

EXHIBIT 1

From: Benson, Craig A [<mailto:cbenson@paulweiss.com>]

Sent: Friday, October 24, 2014 4:49 PM

To: Osborn, Kathy L.; Roberts, Jeffrey S.

Cc: Gallo, Kenneth A; Hurley, Ryan M.

Subject: Re: In re Cathode Ray Tube (CRT) Antitrust Litigation, 3:07-cv-5944-SC (N.D. Cal.)

Thanks, Kathy.

We will need to understand by Monday not only whether you are producing the documents and your 30(b)(6) witness, but also when.

Also, Judge Conti's order explicitly purports to address our request for the French depositions, as indicated several times.

I have a meeting all day Monday but can step out to discuss with you. Please let me know what time and provide a number at which I can reach you. I assume the call need not be lengthy since the issues are straightforward?

Thanks,
Craig

Craig Benson | Partner

Paul, Weiss, Rifkind, Wharton & Garrison LLP

2001 K Street, NW | Washington, DC 20006-1047

(202) 223-7343 (Direct Phone) | (202) 204-7343 (Direct Fax)

CBenson@paulweiss.com | www.paulweiss.com

From: Osborn, Kathy L. [<mailto:Kathy.Osborn@faegrebd.com>]

Sent: Friday, October 24, 2014 04:35 PM

To: Benson, Craig A; Roberts, Jeffrey S. <jeff.roberts@FaegreBD.com>

Cc: Gallo, Kenneth A; Hurley, Ryan M. <Ryan.Hurley@faegrebd.com>

Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation, 3:07-cv-5944-SC (N.D. Cal.)

Craig:

We have reviewed the Court's order and are presently investigating our options in response to the Court's order regarding the production of documents and Thomson SA's Rule 30(b)(6) designee. We appreciate your deadline with the Court, but we also need time to confer with our client.

With regard to the availability of French witnesses for depositions—something not at issue in DAPs' motion and thus in no way compelled by the recent order—let me remind you that all those individuals are former employees, we have no control over them and we have no ability to require any of them to sit for depositions. As we have previously conveyed to you, we have never been able to locate or contact Mr. Lissorgues and have never spoken with him. We are willing to attempt to reach out to the other three witnesses again but, as we have previously informed you, they have all told us they will not voluntarily sit for depositions. It thus continues

to be likely that proceedings under the Hague Convention will be necessary with respect to French witnesses outside of Thomson SA's control.

Are you available for a call about these issues on Monday, sometime after noon eastern?

Regards,
Kathy

Kathy L. Osborn

Partner

kathy.osborn@FaegreBD.com

Direct: +1 317 237 8261

Mobile: +1 317 694 0862

FaegreBD.com [Download vCard](#)

FAEGRE BAKER DANIELS LLP

300 N. Meridian Street

Suite 2700

Indianapolis, IN 46204, USA

From: Benson, Craig A [<mailto:cbenson@paulweiss.com>]

Sent: Thursday, October 23, 2014 4:43 PM

To: Osborn, Kathy L.; Roberts, Jeffrey S.

Cc: Gallo, Kenneth A

Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation, 3:07-cv-5944-SC (N.D. Cal.)

Kathy and Jeff:

In light of the recent order from the Court, please advise whether Thomson SA will produce the documents from France called for in the Court's order, whether Thomson SA's 30(b)(6) witness will be educated with those documents, and whether Thomson SA will make available Mr. Lissorgues, Mr. Charamel, Ms. Martin, and Mr. Trutt. We must inform the Court within 5 days of any open issues so we would obviously be grateful for a prompt answer.

Best regards,
Craig

Craig Benson | Partner

Paul, Weiss, Rifkind, Wharton & Garrison LLP

2001 K Street, NW | Washington, DC 20006-1047

(202) 223-7343 (Direct Phone) | (202) 204-7343 (Direct Fax)

cbenson@paulweiss.com | www.paulweiss.com